

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

DAVID DELL'AQUILA, LORANNDA	)	
BORJA, TODD CHESNEY, and BRENT	)	
WEBER, on behalf of	)	
themselves and all others similarly situated,	)	
	)	
Plaintiffs,	)	
	)	No: 3:19-cv-00679
- against -	)	Judge William L. Campbell Jr.
	)	
NATIONAL RIFLE ASSOCIATION	)	Magistrate Judge Jefferey S. Frensley
OF AMERICA,	)	
	)	
Defendant.	)	

**THE NRA'S MOTION TO DISMISS PLAINTIFFS' SECOND AMENDED COMPLAINT  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41 AND LOCAL RULE 41**

Defendant the National Rifle Association of America (the "NRA"), by and through the undersigned counsel, hereby move to dismiss Plaintiffs' Second Amended Complaint in its entirety pursuant to Federal Rule of Civil Procedure 41 and Local Rule of 41.01 of the United States District Court for the Middle District of Tennessee. This Motion is based upon the NRA's supporting memorandum of law, the accompanying declaration of William A. Brewer, and all of the files, records and proceedings in this civil action.

Dated: April 11, 2022

By: /s/ W. Allen McDonald  
LACY, PRICE & WAGNER PC  
W. Allen McDonald  
249 N. Peters Rd., Suite 101  
Knoxville, TN 37923  
(865)-246-0800

BREWER, ATTORNEYS &  
COUNSELORS

William A. Brewer (admitted *pro hac vice*)  
750 Lexington Avenue, 14th Floor  
New York, NY 10022  
(212)-489-1400

*ATTORNEYS FOR THE NATIONAL  
RIFLE ASSOCIATION OF AMERICA*

**CERTIFICATE OF SERVICE**

I, W. Allen McDonald, hereby certify that I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court on April 11, 2022, using the CM/ECF system, which will send notification to all counsel of record as listed below.

William A. Brewer, Esq.  
750 Lexington Avenue, 14th Floor  
New York, NY 10022  
Email: [wbb@brewerattorneys.com](mailto:wbb@brewerattorneys.com)  
*Co-Counsel for National Rifle Association*

Elliott J. Schuchardt  
SCHUCHARDT LAW FIRM  
6223 Highland Place Way, Suite 201  
Knoxville, TN 37919  
Phone: (865) 304-4374  
Email: [elliott016@gmail.com](mailto:elliott016@gmail.com)  
*Counsel for Plaintiffs*

Date: April 11, 2022

/s/ W. Allen McDonald